



IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

WILLIE R. STRICKLAND (AIS #226537), \*  
Plaintiff, \*  
V. \* CV-05-931  
SAMUEL RAYAPATI, ET AL., \*  
Defendants. \*

**AFFIDAVIT OF SAMUEL RAYAPATI, M.D.**

**STATE OF ALABAMA** )

**COUNTY OF BARBOUR )**

BEFORE ME, \_\_\_\_\_, a notary public in and for said County and State, personally appeared **SAMUEL RAYAPATI, M.D.**, and being duly sworn, deposed and says on oath that the averments contained in the foregoing are true to the best of his ability, information, knowledge and belief, as follows:

"My name is Samuel Rayapati. I am a medical doctor and am over twenty-one years of age. I am personally familiar with all of the facts set forth in this affidavit. I have been licensed as a physician in Alabama since 1992. I have served as the Medical Director for Ventress Correctional Facility in Clayton, Alabama, since February of 2004. At all pertinent times, my employment at Ventress Correctional Facility has been with Prison Health Services, Inc. ("PHS"), the company which currently contracts with the Alabama Department of Corrections to provide medical services to inmates.

Willie R. Strickland (AIS# 226537) is an inmate who has been incarcerated at Ventress Correctional Facility since January 29, 2003. I am familiar with Mr. Strickland's medical history and conditions, and have seen and evaluated him as a patient on numerous occasions. I have also reviewed Strickland's medical records (certified copies of which are being produced to the Court along with this Affidavit.)

On May 17, 2004, Mr. Strickland presented to the healthcare unit at Ventress complaining of pain in his abdomen and groin. I evaluated Mr. Strickland and determined that his pain was possibly associated with a developing hernia. In order to make Mr. Strickland more comfortable, I ordered a supportive truss for his use. On June 3, 2004, Mr. Strickland was re-evaluated for abdominal pain and it was determined that he had developed a small right inguinal hernia. The hernia was not incarcerated. In addition to the supportive truss, I provided Mr. Strickland with "lay in," "bottom bunk" and "no heavy lifting" profiles in order to maximize Mr. Strickland's comfort. I have prescribed him Motrin for pain.

Mr. Strickland has made a complaint in this lawsuit that he has not been provided with appropriate medical care for treatment of his hernia. This allegation is untrue, however, as Mr. Strickland's hernia has been treated appropriately at all times. Since Mr. Strickland's hernia is reducible, surgical correction is not medically indicated.

Based on my review of Strickland's medical records, and on my personal knowledge of the treatment provided to him, it is my opinion that all of his medical conditions and complaints have been evaluated in a timely fashion at Ventress Correctional Facility, and that his diagnosed conditions have been treated in a timely and appropriate fashion. At all times, he has received appropriate medical treatment for his

health conditions from me and the other PHS personnel at Ventress. At no time has he been denied any needed medical treatment. In other words, it is my opinion that the appropriate standard of care has been adhered to at all times in providing medical care, evaluation, and treatment to this inmate.

At no time have I or any of the medical or nursing staff at Ventress Correctional Facility denied Strickland any needed medical treatment, nor have we ever acted with deliberate indifference to any serious medical need of Strickland. At all times, Strickland's known medical complaints and conditions have been addressed as promptly as possible under the circumstances."

Further affiant sayith not.

Samuel Rayapati M.D.  
SAMUEL RAYAPATI, M.D.

STATE OF ALABAMA )

COUNTY OF BARBOUR )

I, Reba J Currie, a Notary Public in and for said State and County, hereby certify that SAMUEL RAYAPATI, M.D. who being known to me and who being duly sworn, and whose name is signed to the foregoing document, acknowledged before me on this date that being first informed of the contents of said document, having read the same, and understanding its purpose and effect, voluntarily executed the same upon the above-stated date.

SWORN TO and SUBSCRIBED BEFORE ME on this the 8<sup>th</sup> day of November, 2005.

Reba J Currie  
NOTARY PUBLIC  
My Commission Expires: 9-8-08

(NOTARIAL SEAL)